

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

GLOBAL FORCE
ENTERTAINMENT, INC. and
JEFFREY JARRETT

Plaintiffs/Counter-Defendants,

v.

CIVIL ACTION NO.3:18-cv-00749

CHIEF JUDGE CRENSHAW

MAGISTRATE JUDGE JOE BROWN

ANTHEM WRESTLING
EXHIBITIONS, LLC,

JURY DEMAND

Defendant/Counterclaim-Plaintiff

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DEPOSITION of SCOTT D'AMORE, a witness in the above-noted action, taken before Sharon L. Masse, in her Chambers at 267 Pelissier Street, Eighth Floor, Windsor, Ontario, and taken by electronic recording by Sandy L. Breitenstein, Court Reporter, on the 18th day of December, 2019.

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A P P E A R A N C E S :

Mr. Samuel F. Miller: Counsel for the Plaintiffs/
Ms. Hayley Baker: Counter-Defendants,
via teleconference.

Mr. Ryan A. Lee: Counsel for the Defendant/
Counterclaim-Plaintiff,
via teleconference.

Mr. Steven Pickard: Counsel for the Witness.

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1 are Villains or Heels. Me and Mr. Pickard may be the
2 best of friends, but if me and you, Mr. Miller, are Baby
3 Faces and Mr. Pickard is a Heel, then me and you are
4 going to travel together. Me and you are going to eat
5 together, and we'll make sure that even if we're all the
6 best of friends, that nobody in public sees us talking or
7 socializing with Mr. Pickard or any of the other Heels.

8 Q. Thank you for that explanation. That helps. I'd
9 like to talk a little bit about the Amp'd content. Are
10 you familiar with the Amp'd content?

11 A. You're referencing the GFW Amp'd tapings?

12 Q. Correct.

13 A. Yes.

14 Q. What involvement, if any, did you have in events
15 that were taped and became the Amp'd content?

16 REPORTER: Sorry, can you repeat that? There was a
17 cough.

18 MR. MILLER: Sure.

19 Q. What, if any, involvement did you have in the
20 event that was taped to create the Amp'd content?

21 A. Well by that point in time, I was-- whatever the
22 proper term is. I apologize if it's shareholder or
23 participating member or whatever. I had a-- an ownership
24 interest of some type in GFW. Also had been working on--
25 working with Mr. Jarrett on deals, you know, to try to

1 establish relationships in the industry to be able to get
2 the-- our business off the ground. One of the things
3 that we struggled with with Global Force, was that we--
4 there was nothing to touch. There was nothing that was--
5 we couldn't prove to people that we could produce a
6 product because we had it. You know, the wrestling
7 industry in this day and age is very television-based,
8 and although we had a good management team together with,
9 you know, Mr. Jarrett; Mr. Sullivan; myself; Mr. Bhalla;
10 we hadn't, as Global Force, produced anything and
11 Mr. Jarrett in-- I say respectfully, somewhat of a last
12 ditch effort, decided that we should try to produce
13 content to show people that we could produce and deliver,
14 'cause that was, according to Mr. Jarrett, one of the big
15 concerns, and it had been expressed by-- I forget who our
16 agent was at the time, working on the television deals,
17 'cause I did everything I could to assist Mr. Jarrett,
18 both as an investor, which I did in good part to try to
19 help him, and-- and also for-- like, I gave him my CV and
20 let him use it freely, and that's where I first became
21 a-- and I-- I don't understand the-- the U.S.
22 connotation, but in Canada I would say, "Well, I had a
23 vice president title with GFW or GFE". I was not
24 actually an officer of the company, but I leant my-- my
25 credibility, as it was, to Jeff and to Global Force, and

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1 I tried to work with him on, you know, putting the stuff
2 together, and then when the Amp'd events came along, Jeff
3 asked me to-- to go to Las Vegas to, you know, to be part
4 of producing the content. So I, you know, reviewed the--
5 the formats and took part in the production meetings and
6 helped produce, and ran the-- the go-position, per se.
7 As we call it in the industry, the person who tells
8 everybody when to go out. The person who gives cues on
9 what to do, you know, times, etcetera. So I performed a
10 lot of the same duties that I had in the past when I--
11 when I worked in the industry in a-- in a backstage or
12 behind the scenes role.

13 Q. So based on-- and you've got a lot there I'd like
14 to go through. You said this was a last ditch effort to
15 put together the content. As I understand your
16 testimony, it's that, for people in the industry to get
17 a t.v. deal, they really wanted a proof of concept, or
18 they wanted the actual concept. Is that what you're
19 saying today?

20 A. Yeah, what I'm saying, if last ditched-- sorry, it
21 was the echoing. The phone was echoing there for a
22 second. I-- I'm relaying what Mr. Jarrett relayed to me
23 at the time, which was that we had been pitching, you
24 know, the concept around in multiple places and had used
25 a-- a couple of pretty well thought of Hollywood people

1 to try to get the-- the show greenlit with a network for
2 broadcast, and we were not-- we were onto our second--
3 second, and I don't know what their-- their role was,
4 what the proper term is, but I'll say agent, for lack of
5 a better term at the time. The second one was A. Smith
6 & Company, and very well respected industry people,
7 people in the-- in the television industry. And we still
8 weren't able to get anybody to-- to pick it up. So, the
9 idea, you know, as best I understand it, was to-- to go
10 there, produce this content to show that we could deliver
11 what we were saying we could deliver product-wise, both
12 as far as for being able to just deliver the content, and
13 also, deliver the content at a level that would be deemed
14 acceptable, appropriate, "good", for cable network home.

15 Q. Alright. So the purpose of this was to create
16 essentially a pilot of 16 episodes for a t.v. deal. Is
17 that right?

18 A. Yeah, I-- and I mean, again, I'm going-- a lot of
19 my dealings were directly with Mr. Jarrett. He-- he
20 originally was hoping that we could-- you know, he
21 thought we might be able to take this "series". I don't
22 recall how many episodes. But take it and get it aired--
23 some-- but I thought-- was hoping we could make a deal
24 with that content. And I mean, ultimately, we weren't
25 able to, but I-- the idea was, we could show that we-- we

1 of Mr. Jarrett.

2 Q. Okay. That's very helpful. Thank you. I'd like
3 to move onto a different exhibit. I'm going to show you
4 what we have previously marked as Exhibit 50. This
5 should be on your screen. And it is an e-mail from you
6 to Mr. Nordholm; Mr. Dutt; and Mr. Gaburick.

7 MR. MILLER: G-A-B-U-R-I-C-K.

8 Q. Dated 9/17/2017. Do you have that before you?

9 A. I do.

10 Q. Alright. At the time Mr. Jarrett went on leave,
11 are you aware of any permission Mr. Jarrett or Global
12 Force Entertainment, Inc. gave Anthem Wrestling to air
13 the Amp'd content?

14 A. Sorry, if I can have a-- do I need-- can I read
15 this e-mail?

16 Q. Sure.

17 A. Clearly there's a spell check mistake here. A
18 correction. I'm just trying to figure out what I was
19 saying. Give me one minute. Okay, thank you,
20 Mr. Miller. I've read the e-mail.

21 Q. Okay. So, let me go back to my question. My
22 question was, are you aware of any authorization that
23 Mr. Jarrett or Global Force Entertainment had given
24 Anthem Wrestling to air the Amp'd content as pay per
25 views?

1 A. It's my understanding, as per my discussion with
2 Mr. Jarrett before it happened, Mr. Jarrett had came to
3 me to talk about the idea. It was Mr. Jarrett's idea to
4 use the Amp'd content, rather than tape One Night Only
5 events in August, at our August tapings. So Mr. Jarrett
6 came to me. I think both, out of respect, as I said, for
7 the fact that I had an interest in Global Force
8 Entertainment and provided the majority of the funding.
9 Also, I think to get my thoughts on the idea, 'cause it
10 was something he had came up with. And he talked to me
11 about it. I, at that time, you know-- we chatted briefly
12 about it. I thought it was a reasonable idea. The Amp'd
13 content was-- was decent content production value-wise,
14 but as I've stated, you know, was-- was older footage,
15 which I didn't see a lot of use for, and if we could make
16 use for it and it saved us having to do One Night Only's,
17 I told Jeff that I-- Jeff-- sorry, Mr. Jarrett, that I
18 thought his idea was a good one. I then know that Jeff
19 came into the creative meeting, which would have all
20 creative team members present, which I can state if you
21 need them, that we would not be shooting One Night Only
22 content at the August taping, and that we would be
23 airing-- the Amp'd footage would be repackaged for a
24 number of months to cover off the One Night Only
25 requirements.

1 would be issued shares. I don't recall per se, if the
2 shares were issued, but I-- I don't-- I don't think that
3 Mr. Jarrett has ever-- has ever disputed that-- that I--
4 he always referred to it as partner, but that I had-- I
5 have shares or membership units, or whatever you would
6 say in-- in Global Force Entertainment.

7 Q. And in 2017, did you have shares or ownership
8 interest in Global Force Entertainment?

9 A. Yes, I did. I-- I still do, to this day.

10 Q. And during 2017, did you ever tell anyone at
11 Anthem Wrestling that they could not air the GFW and
12 content?

13 A. I did not and-- nor would I have the-- the
14 authority to. Because as I stated previously, although
15 I was-- and my Twitter handle, and my Facebook, I think
16 both said I was the vice president of Global Force
17 Entertainment and Global Force Wrestling. I was not
18 actually a dually elected officer, and my understanding,
19 and as Mr. Miller pointed out, I have no law degree, but
20 my common business understanding is that my shareholding
21 or membership units, or whatever they are, doesn't give
22 me the right to speak on behalf of the company any
23 different than any other of my investments give me the
24 right to speak on behalf of those companies.

25 Q. As an owner of Global Force Entertainment, you